

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.: 11-29196  
Judge: Pamela E. Pepper  
Chapter: Chapter 13**

**In Re: Dionisios Christoforos**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Geraci Law, LLC, Attorneys for the Debtor, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court  
517 E. Wisconsin Ave., Rm. 126  
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew M. Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Dionisios Christoforos  
1914 N Main St  
Racine, WI 53402

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponent of this modification is the Debtor, through his Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
  - A. \_\_\_\_\_ post-confirmation
  - B.   X   pre-confirmation (Select i. or ii.):
    - i. \_\_\_\_\_ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially or adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii.   X   Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.
4. The reason for the modification is to provide for all claims.

5. Select A. or B.

A. \_\_\_\_\_ The Chapter 13 Plan confirmed or last modified on \_\_\_\_\_  
(date) is modified as follows: (State the specific language of the  
modification.)

B.   X   The unconfirmed Chapter 13 Plan is modified as follows: Kay  
Jewelers will be paid their full claim, at 3.25% interest, pro rata. Claim  
amount is \$136.

All remaining terms and provisions of the Plan are unaffected unless  
specifically addressed herein. In the event of a conflict between the original Plan  
and the modification set forth above, the latter shall supersede and control.

**6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION  
CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND  
ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE  
REMAINING TERMS AND PROVISIONS OF THE PLAN ARE  
CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the Court approve the modification to the  
Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Monday, September 12, 2011.

By: /s/ Andrew M. Golanowski  
Andrew M. Golanowski  
Attorney for Debtor  
Bar #: 1055499

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Monday, September 12, 2011:

Dionisios Christoforos  
1914 N Main St  
Racine, WI 53402

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Monday, September 12, 2011:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Monday, September 12, 2011.

By: /s/ Andrew M. Golanowski  
Andrew M. Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-0100  
Fax: (312) 332-6354  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Reinhart Foodservices LLC  
Attn: Bankruptcy Dept.  
9950 S Reinhart Drive PO Box  
Oak Creek, WI 53154-0395

First Premier BANK  
Attn: Bankruptcy Dept.  
601 S Minnesota Ave  
Sioux Falls, SD 57104

Sysco Eastern Wisconsin  
Attn: Bankruptcy Dept.  
One Sysco Dr.  
Jackson, WI 53037

Aargon Agency INC  
Attn: Bankruptcy Dept.  
3025 W Sahara Ave  
Las Vegas, NV 89102

Citgo/CBSD  
Attn: Bankruptcy Dept.  
Po Box 6497  
Sioux Falls, SD 57117

Commercial Recovery Group  
Attn: Bankruptcy Dept.  
1012 State College RD  
Dover, DE 19904

Marshall & Ilsley Bank  
Attn: Bankruptcy Dept.  
770 N Water St  
Milwaukee, WI 53202

Shell/CITI  
Attn: Bankruptcy Dept.  
Po Box 6497  
Sioux Falls, SD 57117

WE Energies  
Elaine  
333 W. Everett Street  
Milwaukee, WI 53203

T-Mobile  
C/O Pinnacle Financial GRO  
7825 Washington Ave S St  
Minneapolis, MN 55439

HSBC/Bsbuy  
Attn: Bankruptcy Dept.  
Po Box 15519  
Wilmington, DE 19850

Dept. Workforce Development  
Unemployment Insurance  
P.O. Box 7905  
Madison, WI 53707-7905

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta, GA 30374

HSBC BANK  
Attn: Bankruptcy Dept.  
Po Box 5253  
Carol Stream, IL 60197

Wisconsin Dept. of Revenue  
Bankruptcy Notice  
2135 Rimrock Road  
Madison, WI 53713

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen, TX 75013

Merrick BANK  
Attn: Bankruptcy Dept.  
Po Box 9201  
Old Bethpage, NY 11804

IRS Priority Debt  
Attn: Bankruptcy Dept.  
PO Box 7346  
Philadelphia, PA 19101

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester, PA 19022

THD/CBSD  
Attn: Bankruptcy Dept.  
Po Box 6497  
Sioux Falls, SD 57117

Castleman and Sons Plumbing  
Attn: Bankruptcy Dept.  
11725 W Scherrei Dr.  
Franklin, WI 53132

KAY Jewelers  
Attn: Bankruptcy Dept.  
375 Ghent Rd  
Akron, OH 44333

HSBC/Mnrds  
Attn: Bankruptcy Dept.  
90 Christiana Rd  
New Castle, DE 19720

Milwaukee County Circuit Cour  
2010CV015609  
901 N. 9th ST.  
Milwaukee, WI 53233

CCS/FIRST SAVINGS BANK  
Attn: Bankruptcy Dept.  
500 E 60Th St N  
Sioux Falls, SD 57104

HSBC BANK  
Attn: Bankruptcy Dept.  
Po Box 5253  
Carol Stream, IL 60197

Milwaukee County Circuit Cour  
2011SC007673  
901 N. 9th ST.  
Milwaukee, WI 53233

First Premier BANK  
Attn: Bankruptcy Dept.  
601 S Minnesota Ave  
Sioux Falls, SD 57104

Waukesha Wholesale Foods  
Attn: Bankruptcy Dept.  
900 Gale St  
Waukesha, WI 53186

Milwaukee College Physicians  
Attn: Bankruptcy Department  
1155 N. Mayfair Rd.  
Milwaukee, WI 53213

Capital One  
Attn: Bankruptcy Dept.  
Po Box 85520  
Richmond, VA 23285

Performance Food Group Co.  
Attn: Bankruptcy Dept.  
PO BOX 7210  
Rock Island, IL 61204

Main Street Law Offices LLC  
2010CV015609  
504 Main St, #200  
La Crosse, WI 54602

Kohner, Mann & Kailas SC  
2011SC007673  
4650 N. Port Washington Rd.  
Milwaukee, WI 53212

Judley Wyant  
Bankruptcy Notice  
510 College Ave  
Racine, WI 53401